

1 Lawrence J. Semenza, III, Esq., Bar No. 7174
Email: ljs@semenzalaw.com

2 Christopher D. Kircher, Esq., Bar No. 11176
Email: cdk@semenzalaw.com

3 Jarrod L. Rickard, Esq., Bar No. 10203
Email: jlr@semenzalaw.com

4 LAWRENCE J. SEMENZA, III, P.C.
5 10161 Park Run Drive, Suite 150
6 Las Vegas, Nevada 89145
7 Telephone: (702) 835-6803
Facsimile: (702) 920-8669

8 Kenneth B. Morgan, Esq. (*Pro Hac Vice Admitted*)
9 KENNETH B. MORGAN, P.C.
10 180 High Oak Drive, Suite 202
Bloomfield Hills, MI 48304
Telephone: (248) 594-6341

**JOINT RULE 6(b)(1) MOTION FOR
EXTENSION OF TIME PROVIDED
BY LR 54-14 & ORDERS DATED
6/28/18 & 6/29/18**

11 *Attorneys for Defendant Meridian Private Residences CH, LLC*

12 Michael N. Feder, Esq.
13 DICKINSON WRIGHT PLLC
14 mfeder@dickinson-wright.com

15 Kenneth B. Morgan, Esq. (*Pro Hac Vice Admitted*)
16 KENNETH B. MORGAN, P.C.
17 180 High Oak Drive, Suite 202
Bloomfield Hills, MI 48304
Telephone: (248) 594-6341

18 *Attorneys for Defendant Koval Flamingo, LLC*

19 Michael R. Mushkin, Esq.
20 MICHAEL R. MUSHKIN & ASSOCIATES
21 michael@mushlaw.com
22 steven@mushlaw.com
Attorneys for Plaintiffs

23 Kristina S. Holman, Esq.
24 kholmanlaw@gmail.com
25 ksholman@aol.com
Attorneys for Defendant Rebekah Desmet

26 David A. Carroll, Esq.
27 Anthony J. DiRaimondo, Esq.
28 RICE REUTHER SULLIVAN & CARROLL, LLP
dcarroll@rrsc-law.com
adiraimondo@rrsc-law.com

*Attorneys for American Invsco Corporation, Nicholas Gouletas
& Condominium Rental Services*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRUCE COUTURIER and ELEANOR COUTURIER, Plaintiffs, vs. AMERICAN INVSCO, et al., Defendants.	Case No.: 2:12-cv-01104-APG-NJK Consolidated with Case No.'s for Discovery: Case No.: 2:12-cv-01106-APG-NJK Case No.: 2:12-cv-01107-APG-NJK Case No.: 2:12-cv-01108-APG-NJK Case No.: 2:12-cv-01110-APG-NJK Case No.: 2:12-cv-01111-APG-NJK
SHAHIN EDALATDJU and NASILA EDALATDJU, Plaintiffs, vs. AMERICAN INVSCO, et al., Defendants.	Case No.: 2:12-cv-01106-APG-NJK Consolidated with Case No.'s for Discovery: Case No.: 2:12-cv-01104-APG-NJK Case No.: 2:12-cv-01107-APG-NJK Case No.: 2:12-cv-01108-APG-NJK Case No.: 2:12-cv-01110-APG-NJK Case No.: 2:12-cv-01111-APG-NJK
MARY HELDT, VICTOR HELDT, and SNAP PROPERTIES, LLC, a Nevada Limited Liability Company; Plaintiffs, vs. AMERICAN INVSCO, et al., Defendants.	Case No.: 2:12-cv-01107-APG-NJK Consolidated with Case No.'s for Discovery: Case No.: 2:12-cv-01104-APG-NJK Case No.: 2:12-cv-01106-APG-NJK Case No.: 2:12-cv-01108-APG-NJK Case No.: 2:12-cv-01110-APG-NJK Case No.: 2:12-cv-01111-APG-NJK
NASIR KOSA; BASIL KOSA, and SAID MATTI, Plaintiffs, vs. AMERICAN INVSCO, et al., Defendants.	Case No.: 2:12-cv-01108-APG-NJK Consolidated with Case No.'s for Discovery: Case No.: 2:12-cv-01104-APG-NJK Case No.: 2:12-cv-01106-APG-NJK Case No.: 2:12-cv-01107-APG-NJK Case No.: 2:12-cv-01110-APG-NJK Case No.: 2:12-cv-01111-APG-NJK
WISAM KOSA, RAGID KOSA, and MAHA KOSA, Plaintiffs,	Case No.: 2:12-cv-01111-APG-NJK Consolidated with Case No.'s for Discovery: Case No.: 2:12-cv-01104-APG-NJK Case No.: 2:12-cv-01106-APG-NJK

1 vs. 2 AMERICAN INVSCO, et al., 3 Defendants.	Case No.: 2:12-cv-01107-APG-NJK Case No.: 2:12-cv-01108-APG-NJK Case No.: 2:12-cv-01110-APG-NJK
--	---

4 **JOINT RULE 6(b)(1) MOTION**
5 **FOR EXTENSION OF TIME**
6 **PROVIDED BY LR 54-14**
7 **&**
8 **ORDERS DATED JUNE 28 & 29, 2018**

9 The parties, by and through their respective counsel, hereby move for entry of an order
10 under Fed.R.Civ.P. 6(b)(1) extending the periods provided by LR 54-14 and this court's orders
11 dated June 28 & 29, 2018 pertaining to motions for attorney's fees in each of the above actions,
12 for the following reasons:

- 13 1. These actions have been pending before this court since their removal in October 2008.
- 14 2. On June 28 & 29, 2018, the court entered orders and judgments of final adjudication
15 regarding each of them.
- 16 3. In those orders, the court instructed Plaintiffs to file motions for attorney's fees (if any)
17 within 14 days (*i.e.*, on or before July 12, 2018 (as to certain of these actions) and July 13, 2018
18 (as to the rest). It also instructed Plaintiffs' counsel to confer with Defendant Meridian's counsel
19 regarding such matters before filing any such motion.
- 20 4. Because these actions were commenced, in part, based upon claims arising under 15 U.S.
21 Code Chapter 2B, 15 U.S.C. § 78u-4(c) provides for a mandatory review by this court regarding
22 whether any party has violated Rule 11 in respect to any pleadings or dispositive motion and
23 response thereto during the nearly 10-year history of this/these action(s).
- 24 5. LR 54-14 provides that motions for attorney's fees are to be filed within 14 days of the
25 entry of a final judgment or order disposing of an action which the United States Supreme Court
26 has held is the date of entry of an order disposing of the substantive elements of an action, despite
27
28

1 the existence or potential for a motion for attorney's fees. *Ray Haluch Gravel Co. v. Cent.*
2 *Pension Fund of Int'l Union of Operating Engineers & Participating Employers*, 134 S. Ct. 773
3 (2014).

4 6. Counsel for all Plaintiffs and the principal Defendants, Koval Flamingo, LLC and
5 Meridian Private Residences CH, LLC have conferred about such matters and have agreed that
6 additional time is necessary to effectively review each parties' claim(s) for attorney's fees and
7 that it would unduly burden the court and the parties to require such motions to be filed within the
8 period provided by LR 54-14 and the court's orders of June 28 & 29, 2018.

10 7. Accordingly, there is good cause within the meaning of Fed.R.Civ.P. 6(b)(1) for an
11 extension of the period within which to file the parties' respective motions for attorney's fees in
12 these actions.

13 8. This motion is timely pursuant to Fed.R.Civ.P. 6(b)(1)(A) in that it has been filed prior to
14 the expiration of the period for which extension is sought.

16 WHEREFORE, the parties request that this court enter an order extending the periods
17 within which to file motions for attorney's fees in these actions for a period of 28-days
18 (*i.e.*, until August 9 & 10, 2018).

19 DATED this 12th day of July 2018.

21 IT IS SO ORDERED.

22 Dated: July 13, 2018

23 

24 _____
25 ANDREW P. GORDON
26 UNITED STATES DISTRICT JUDGE

KENNETH B. MORGAN, P.C.

/s/ Kenneth B. Morgan

Kenneth B. Morgan, Esq. (*Pro Hac Vice Admitted*)
180 High Oak Drive, Suite 202
Bloomfield Hills, MI 48304

LAWRENCE J. SEMENZA, III, P.C.

Lawrence J. Semenza, III, Esq., Bar No. 7174
Christopher D. Kircher, Esq., Bar No. 11176
Jarrod L. Rickard, Esq., Bar No. 10203
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
*Attorneys for Defendant Meridian Private
Residences CH, LLC*

KENNETH B. MORGAN, P.C.
/s/ Kenneth B. Morgan
Kenneth B. Morgan, Esq. (*Pro Hac Vice Admitted*)
KENNETH B. MORGAN, P.C.
180 High Oak Drive, Suite 202
Bloomfield Hills, MI 48304
Telephone: (248) 594-6341

DICKINSON WRIGHT PLLC
Michael N. Feder
DICKINSON WRIGHT PLLC
mfeder@dickinson-wright.com
Attorneys for Defendant Koval Flamingo, LLC

KRISTINA S. HOLMAN, ESQ.
/s/Kristina S. Holman
kholmanlaw@gmail.com
ksholman@aol.com
Attorneys for Defendant Rebekah Desmet

RICE REUTHER SULLIVAN & CARROLL, LLP
/s/ Anthony J. DiRaimondo
David A. Carroll, Esq.
Anthony J. DiRaimondo, Esq.
dcarroll@rrsc-law.com
adiraimondo@rrsc-law.com
*Attorneys for American Invsco Corporation,
Nicholas Gouletas & Condominium Rental Services*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of July 2018, I electronically filed the foregoing **JOINT RULE 6(b)(1) MOTION FOR EXTENSION OF TIME PROVIDED BY LR 54-14 & ORDERS DATED 6/28/18 & 6/29/18** with the Clerk of the Court using the ECF system, which will send notification of such filing to the attorneys of record in this matter which are listed below:

Michael R. Mushkin, Esq.
MICHAEL R. MUSHKIN & ASSOCIATES
michael@mushlaw.com

Kenneth B. Morgan, Esq.
KENNETH B. MORGAN P.C.
morgan.kb@kbmpc.com

1 and
2 Michael N. Feder, Esq.
3 DICKINSON WRIGHT PLLC
4 mfeder@dickinson-wright.com
5 *Attorneys for Defendants Koval Flamingo, LLC*
6 *Attorneys for Defendant Meridian Private*
7 *Residences CH, LLC*

8 Kristina S. Holman, Esq.
9 kholmanlaw@gmail.com
10 ksholman@aol.com
11 *Attorneys for Defendant Rebekah Desmet*

12 David A. Carroll, Esq.
13 Anthony J. DiRaimondo, Esq.
14 RICE REUTHER SULLIVAN & CARROLL, LLP
15 dcarroll@rrsc-law.com
16 adiraimondo@rrsc-law.com
17 *Attorneys for American Invsco Corporation, Nicholas Gouletas*
18 *& Condominium Rental Services*

19
20
21
22
23
24
25
26
27
28
/s/Kenneth B. Morgan